

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**MICHAEL COREY JENKINS,  
EDDIE TERRELL PARKER**

**PLAINTIFFS**

**v.**

**CAUSE NO. 3:23-cv-374-DPJ-ASH**

**RANKIN COUNTY, MISSISSIPPI, et al.**

**DEFENDANTS**

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**RANKIN COUNTY'S MOTION FOR SUMMARY JUDGMENT**

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**NOW COMES** Defendant Rankin County, Mississippi, by and through counsel, and respectfully moves for summary judgment by stating as follows:

1. Even though Rankin County cannot assert the defense of qualified immunity, the Court's analysis of Plaintiffs' *Monell* claims against Rankin County would be the same as its analysis of the failure to supervise and ratification claims against Sheriff Bailey, as the final policymaker for the Rankin County Sheriff's Department. *Valle v. City of Houston*, 613 F.3d 536, 544 (5th Cir. 2010).

2. In the interest of judicial economy, Rankin County joins and incorporates herein by reference Sheriff Bailey's [132] Motion for Summary Judgment, [133] Memorandum of Authorities, and [154] Reply, including any and all exhibits to these pleadings.

**WHEREFORE, PREMISES CONSIDERED,** Defendant Rankin County joins Sheriff Bailey's [132] Motion for Summary Judgment and prays that this Court dismiss any and all claims against it with prejudice.

**RESPECTFULLY SUBMITTED**, this 28<sup>th</sup> day of April, 2025.

**RANKIN COUNTY - DEFENDANT**

**BY:** /s/ Jason E. Dare  
**JASON E. DARE**

**OF COUNSEL:**

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